

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

FEI GUAN,)
Plaintiff,)
)
v.) Case No. 1:17-cv-00332 (JCC/IDD)
)
BING RAN; ALICE GUAN; ADVANCED)
SYSTEMS TECHNOLOGY AND)
MANAGEMENT, INC.; AND QI TECH,)
LLC,)
)
Defendants.)

**MOTION TO DISMISS THE AMENDED COMPLAINT ON BEHALF OF DEFENDANT
ADVANCED SYSTEMS TECHNOLOGY AND MANAGEMENT, INC.**

Defendant Advanced Systems Technology and Management, Inc. (“AdSTM”) respectfully moves this Court to dismiss the Amended Complaint pursuant to (1) Fed. R. Civ. P. 12(b)(6) because Counts I through III fail to state a claim upon which relief can be granted under the human trafficking statute, and (2) Fed. R. Civ. P. 12(b)(1) because Count V’s request for declaratory relief fails to allege a justiciable case or controversy. The grounds for this motion are set forth more fully in the accompanying memorandum of law.

Dated: May 24, 2017

Respectfully submitted,

/s/ James B. Kinsel
James B. Kinsel (VSB No. 44247)
Rebecca Bricken Segal (VSB No. 73403)
PROTORAE LAW, PLLC
1921 Gallows Road, Suite 950
Tysons, VA 22182
(p) 703-749-8507
(f) 703-942-6758
jkinsel@protoraelaw.com
rsegal@protoraelaw.com

*Counsel for Defendant Advanced Systems
Technology and Management, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2017, I electronically filed a true and correct copy of the foregoing paper with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing (NEF) to all registered users of the Court's CM/ECF system who have filed notices of appearance in this matter.

/s/ James B. Kinsel _____